

MEMO ENDORSED

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July 21, 2023

BY CM/ECF and eMail to ALcarterNYSDChambers@nysd.uscourts.gov

Hon. Andrew L. Carter, Jr., U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Patricia Gatling-Brooks v. Liberty Mutual, etc., et. al
1:22-CV-08979 (ALC)(KHP)
Request To Extend Time To File Amended Complaint

Your Honor:

Delmas Costin and I represent the Plaintiff in this lawsuit alleging discrimination, retaliation and unfair labor practices under Title VII and the Human Rights Laws of New York State and New York City. I write to respectfully request that the Court extend the time for Plaintiff to file an amended complaint by two weeks from July 28, 2023 until August 11, 2023 with Defendants' response due on September 15, 2023. Defendants' counsel, William Anthony, consents to this request. This is Plaintiff's fourth request to extend the time to file the amended complaint. The Court granted Plaintiff's last request on June 23, 2023 [Doc. No. 31].

This request was made because of an unexpected emergency that required our client to leave the metropolitan area to care for a close family member. Our client has had to stay out of state longer than expected to arrange and coordinate long term care. This has effected our ability to consult with her.

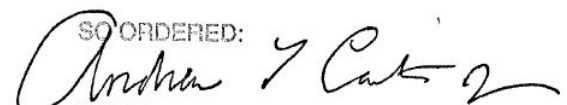
We appreciate the courtesy and consideration of Defendants in consenting to this request and respectfully ask the Court to grant this request to extend the time for Plaintiff to file her amended complaint two weeks until August 11, 2023 with Defendants' response due on September 15, 2023.

Respectfully yours,



Ronald B. McGuire

cc (by CM/ECF and eMail):
William J. Anthony, Esq.
Merlie P. Blaise, Esq.
Delmas A. Costin, Esq.



HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

7/24/2023